

Gena L. Sluga, Nevada Bar No. 9910
CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Telephone: (702) 362-6666
Facsimile: (702) 992-1000
gsluga@cdslawfirm.com
Attorneys for Foremost Signature Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

FOREMOST SIGNATURE INSURANCE
COMPANY, a Michigan corporation duly
licensed to sell and administer insurance in
The State of Nevada,

Plaintiff,

Vs.

GMUENDER ENGINEERING, LLC, a Nevada
limited liability company; JOSEF C.
GMUENDER and JANE DOE GMUENDER,
husband and wife; MARY E. GMUENDER and
JOHN DOE GMUENDER, husband and wife;
WILLIAM HUBER, parent and guardian of
Ashley Huber and Taylor Huber, individually and
as surviving children of Kelly Huber, deceased;
GRANBY REALTY HOLDINGS, LLC, a
Colorado limited liability company; GRANITE
STATE INSURANCE COMPANY, an Illinois
corporation; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH
PA, a Pennsylvania corporation.

Defendants.

Case No. 3:19-cv-00508-MMD-CLB

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF JOINT MOTION
FOR ENTRY OF STIPULATED
JUDGMENT [ECF 25]**

(First Request)

(Assigned to the Honorable Miranda M. Du)

The parties, by and through undersigned counsel, hereby stipulate and agree to extend the
deadline for Foremost Signature Insurance Company, Gmuender Engineering, LLC, and Josef C.
Gmuender to file a Reply in support of its Joint Motion for Entry of a Stipulated Judgment Against
Gmuender Engineering, LLC and Josef C. Gmuender (ECF 25) to and including May 22, 2020. This
stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the requested extension as
Foremost Signature Insurance Company, Gmuender Engineering, LLC, and Josef C. Gmuender, and

1 their counsel are all in remote protocols due to effective COVID-9 requirements at their normal places
2 of business. Due to remote work protocols, additional time for attorney-client consultation and analysis
3 of the briefing is required. The parties to this stipulation agree that additional time is needed to fully
4 evaluate and respond to the issues presented by the Response filed on May 12, 2020 (ECF 39). The
5 parties stipulate that Foremost Signature Insurance Company, Gmuender Engineering, LLC, and Josef
6 C. Gmuender may file a joint Reply or separate Replies by no later than Friday, May 22, 2020.

7
8 RESPECTFULLY SUBMITTED this 19th day of May 2020.

9 CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC

10 By: /s/ Gena L. Sluga

11 Gena L. Sluga

12 8985 South Eastern Avenue, Suite 200

13 Las Vegas, Nevada 89123

Attorney for Foremost Signature Insurance Company

14 NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN, LLC

15 By: /s/ Jeffrey N. Labovitch (w/ permission)

16 Jeffrey N. Labovitch

17 4365 Executive Drive, Suite 950

18 San Diego, CA 92121

*Attorneys for Granite State Insurance Company and
National Union Fire Insurance Company of Pittsburgh,
Pa.*

19
20 LAURIA TOKUNAGA GATES & LINN, LLP

21 By: /s/ Mark Tokunaga (w/ permission)

22 Mark Tokunaga

23 885 Tahoe Blvd., Ste. 7

24 Incline Village, NV 89451

*Attorney for Gmuender Engineering, LLC and Josef C.
Gmuender*

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ORDER

The Court, having reviewed the Stipulation And [Proposed] Order for Extension of Time To File Reply In Support of Joint Motion for Entry Of Stipulated Judgment [ECF 25], and for good cause appearing:

IT IS HEREBY ORDERED that Foremost Signature Insurance Company, Gmuender Engineering, LLC, and Josef C. Gmuender shall file a joint Reply or separate Replies by no later than Friday, May 22, 2020.

IT IS SO ORDERED.

Dated this 19th day of May 2020.



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of May 2020, service of the foregoing
**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE REPLY
IN SUPPORT OF JOINT MOTION FOR ENTRY OF STIPULATED JUDGMENT [ECF 25]**
was made upon each party in the case who is registered as an electronic case filing user with the Clerk,
pursuant to Fed. Rule civ. P. 5(b)(3), and Local Rule 5-4, and by electronic mailing as follows:

Jeffrey N. Labovitch
jlabovitch@nicolaidesllp.com
NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP
4365 Executive Drive, Suite 950
San Diego, CA 92121
Telephone: 858-257-0700

Kevin E. Helm
KevinH@helmandassociates.net
HELM & ASSOCIATES
2330 Paseo Del Prado, Suite C103
Las Vegas, NV 89102
Telephone: (702) 258-0022
*Attorneys for Granite State Insurance Company
and National Union Fire Insurance Company of Pittsburgh, Pa.*

Mark Tokunaga
mtokunaga@ltglaw.net
LAURIA TOKUNAGA GATES & LINN, LLP
885 Tahoe Blvd., Ste. 7
Incline Village, NV 89451
Tel: 775-772-8016
Attorney for Gmuender Engineering, LLC and Josef C. Gmuender

/s/ Harleigh Scott

An Employee of Christian, Kravitz, Dichter, Johnson & Sluga,
LLC